

EXHIBIT C



U.S. Department of Justice
U.S. Victims of State Sponsored Terrorism Fund

P.O. Box 10299
Dublin, OH 43017-5899

July 05, 2024

VIA ELECTRONIC MAIL

John Eubanks
Motley Rice LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29464

Re: United States Victims of State Sponsored Terrorism Fund

Dear Counsel:

Thank you for the letter you sent dated July 1, 2024 on behalf of yourself, Megan W. Benett from Kreindler & Kreindler LLP, Jerry S. Goldman from Anderson Kill P.C., and Jeanne M. O'Grady from Speiser Krause, P.C. In the letter, counsel jointly requested a two-week extension of the July 1, 2024 filing deadline for new U.S. Victims of State Sponsored Terrorism Fund (USVSST Fund) applications to be considered for the fifth distribution. The letter explains that counsel are awaiting various judgments related to the case *In re Terrorist Attacks on Sept. 11, 2001*, No. 03-md-1570 (GBD)(SN) (S.D.N.Y.). Counsel requested an extension of the USVSST Fund's July 1, 2024 filing deadline pursuant to 34 U.S.C. § 20144(c)(3)(B) for "good cause shown."

The Justice for United States Victims of State Sponsored Terrorism Act's provision regarding granting "a reasonable extension of a deadline" pertains to the filing of an Application Form beyond the statutory 90-day deadline for filing an application based on obtaining a final judgment. *See* 34 U.S.C. § 20144(c)(3)(B) & (j)(4) (defining final judgment). In order for a new claimant to be considered for eligibility for the USVSST Fund's fifth distribution, the claimant's application must have been submitted with a damages judgment by the July 1, 2024 application deadline.¹ This filing deadline for claims to be considered for eligibility in the fifth distribution is separate and apart from the statutory 90-day filing deadline, and is final. The application deadlines to be considered for a distribution grow out of the statutory requirements for claims processing.

Accordingly, although I understand the issues presented in this matter and appreciate counsel's advocacy, the request for an extension of the July 1, 2024 filing deadline for new claims to be included in the fifth round of USVSST distributions is denied. Claims submitted after July 1, 2024 will be considered for sixth-round payments, if any.

In addition to awaiting judgments for prospective new claimants, counsel also indicated they are awaiting supplemental damage awards for claims that were filed with

¹ *See* Special Master's Announcement Regarding the July 1st Filing Deadline for NEW Applications, dated April 30, 2024, available on the USVSST Fund's [website](#).

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the USVSST Fund with a judgment before July 1, 2024. USVSST Fund will announce at a later date the deadline for claimants to update their compensatory damage amounts for consideration for fifth round payments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Patrice Brown". The signature is fluid and cursive, with the first name "Mary" being the most prominent.

Mary Patrice Brown
Special Master
U.S. Victims of State Sponsored Terrorism Fund

cc: Jerry S. Goldman
Megan W. Benett
Jeanne M. O'Grady